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LONG-TERM DISABILITY INSURANCE PLAN and
Real Party in Interest STANDARD INSURANCE
COMPANY

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA

PATRICIA BROYLES,

Plaintiff,

v.

**A.U.L. CORPORATION LONG-TERM
DISABILITY INSURANCE PLAN,**

Defendant,

STANDARD INSURANCE COMPANY,

Real Party in Interest.

No. C-07-5305-MMC

**DEFENDANT'S ADMINISTRATIVE
MOTION TO FILE DOCUMENTS
UNDER SEAL; DECLARATION OF
KATHERINE S. RITCHEY IN
SUPPORT OF DEFENDANT'S
ADMINISTRATIVE MOTION TO FILE
DOCUMENTS UNDER SEAL**

Date: August 1, 2008

Time: 9:00 a.m.

Before the Honorable Maxine M. Chesney

Pursuant to Local Rules 7-11(a) and 79-5(c), Defendant A.U.L. Corporation Long-Term Disability Insurance Plan ("A.U.L. Plan") requests that the Court order the Clerk of the Court to file under seal the confidential documents that Defendant lodged with the Court on June 27, 2006 in connection with Defendant A.U.L. Corporation Long Term Disability Plan's Motion to Review Plaintiff's Claim for ERISA Benefits Under Abuse of Discretion Standard of Review. The requested relief is necessary and narrowly tailored to protect the confidentiality of certain

1 documents. Private information about Plaintiff Patricia Broyles has been redacted where possible
2 to allow public access to documents with limited confidential information, and redacted
3 documents are stamped "REDACTED." Those documents containing private information that
4 could not be protected through redaction are submitted for filing under seal. This request is
5 supported by the declaration of Katherine S. Ritchey below. Pursuant to Local Rule 79-5, a
6 proposed order accompanies this request to seal the following documents, each of which is
7 attached as an exhibit to the Confidential Declaration of George Chan in Support of Defendant
8 A.U.L. Corporation Long Term Disability Plan's Notice of Motion to Review Plaintiff's Claim
9 for ERISA Benefits Under Abuse of Discretion Standard of Review:

10 1. Exhibit 8, which is a true and correct copy of the document bates numbered STND1149
11 00288-00291, which is part of the administrative record, and which describes Plaintiff's medical
12 condition.

13 2. Exhibit 11, which is a true and correct copy of the document bates numbered STND1149
14 00307-00309, which is part of the administrative record, and which describes Plaintiff's medical
15 condition.

16 3. Exhibit 12, which is a true and correct copy of the document bates numbered STND1149
17 00312, 00321, 00331, 00336, 00339, 00340, which is part of the administrative record, and which
18 describes Plaintiff's medical condition.

19 4. Exhibit 15, which is a true and correct copy of the document bates numbered STND1149
20 00209-00210, which is part of the administrative record, and which describes Plaintiff's medical
21 condition.

22 5. Exhibit 17, which is a true and correct copy of the document bates numbered STND1149
23 00181-00182, which is part of the administrative record, and which describes Plaintiff's medical
24 condition.

25 6. Exhibit 18, which is a true and correct copy of the document bates numbered STND1149
26 00361-00366, which is part of the administrative record, and which describes Plaintiff's medical
27 condition.
28

1 7. Exhibit 20, which is a true and correct copy of the document bates numbered STND1149
2 00371, which is part of the administrative record, and which describes Plaintiff's medical
3 condition.

4 8. Exhibit 21, which is a true and correct copy of the document bates numbered STND1149
5 00372-00373, which is part of the administrative record, and which describes Plaintiff's medical
6 condition.

7 9. Exhibit 22, which is a true and correct copy of the document bates numbered STND1149
8 00374, which is part of the administrative record, and which describes Plaintiff's medical
9 condition.

10 10. Exhibit 28, which is a true and correct copy of the document bates numbered STND1149
11 00254, which is part of the administrative record, and which describes Plaintiff's medical
12 condition.

13 11. Exhibit 29, which is a true and correct copy of the document bates numbered STND1149
14 00390, which is part of the administrative record, and which describes Plaintiff's medical
15 condition.

16 12. Exhibit 30, which is a true and correct copy of the document bates numbered STND1149
17 00252, which is part of the administrative record, and which describes Plaintiff's medical
18 condition.

19 13. Exhibit 31, which is a true and correct copy of the document bates numbered STND1149
20 00265-00266, which is part of the administrative record, and which describes Plaintiff's medical
21 condition.

22 14. Exhibit 32, which is a true and correct copy of the document bates numbered STND1149
23 00414-00416, which is part of the administrative record, and which describes Plaintiff's medical
24 condition.

25 15. Exhibit 35, which is a true and correct copy of the document bates numbered STND1149
26 00273-00275, which is part of the administrative record, and which describes Plaintiff's medical
27 condition.

1 16. Exhibit 36, which is a true and correct copy of the document bates numbered STND1149
2 00419-00424, which is part of the administrative record, and which describes Plaintiff's medical
3 condition.

4 Dated: June 27, 2008

Respectfully submitted,

5 Jones Day

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7 By: /s/ - Katherine S. Ritchey

8 Katherine S. Ritchey

9 for Defendant A.U.L. CORPORATION
10 LONG-TERM DISABILITY INSURANCE
11 PLAN and Real Party in Interest
12 STANDARD INSURANCE COMPANY
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**DECLARATION OF KATHERINE S. RITCHEY IN SUPPORT OF DEFENDANT'S
ADMINISTRATIVE MOTION TO FILE DOCUMENTS UNDER SEAL**

I, KATHERINE S. RITCHEY, declare as follows:

1. I am an attorney duly admitted to practice in California and before this Court. I am a partner in the law firm of Jones Day in San Francisco, California, counsel for Defendant A.U.L. Plan and Real Party in Interest Standard Insurance Company in the above-captioned action. I make this declaration of my own personal knowledge, and, if called as a witness, I could and would testify competently to the facts set forth herein.

2. Sealing of the documents identified in Defendant's Administrative Motion to File Documents Under Seal is warranted because each of these documents is a medical record of the Plaintiff or describes medical information about Plaintiff in detail. I have narrowly tailored the number of confidential documents in this request and redacted documents in order to minimize those that need be filed under seal.

I declare under penalty of perjury that the foregoing is true and correct and that this Declaration was executed on June 27, 2008 in San Francisco, California.

/s/ Katherine S. Ritchey
Katherine S. Ritchey